

**UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

IN RE TESLA INC. STOCKHOLDER  
DERIVATIVE LITIGATION

Lead Case No.: 1:22-cv-00592-LY

(Consolidated with Case No. 1:22-cv-  
00611-LY)

This Document Relates To:

All Cases

**AGREED MOTION TO MODIFY BRIEFING SCHEDULE  
FOR FILINGS IN RESPONSE TO  
SECOND AMENDED CONSOLIDATED COMPLAINT**

COMES NOW plaintiff Alvin Janklow (“Plaintiff”), individual defendant Elon Musk, and nominal defendant Tesla, Inc. (collectively, “Defendants,” and with Plaintiff, the “Parties”) move to modify the current deadlines for the Parties to file briefing related to Plaintiff’s Second Amended Consolidated Complaint (“SAC”). In support of this motion, the Parties state and propose as follows:

1. Defendants shall file their Motion to Dismiss the SAC on or before July 1, 2024.
2. Plaintiff shall file his Answering Brief in opposition to the Motion to Dismiss on or before August 15, 2024.
3. Defendants shall file their Reply Brief in further support of the Motion to Dismiss on or before September 16, 2024.

The agreed-to extension is not entered into for purposes of delay and will not result in any prejudice.

WHEREFORE, the Parties pray for an order entering the Parties’ briefing schedule as set forth in this motion.

Dated: May 16, 2024

Respectfully Submitted,

/s/ Boris Feldman

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Dated: May 16, 2024

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**CERTIFICATE OF CONFERENCE**

I certify that on May 15, 2024, I conferred with counsel for Plaintiff, Shane Sanders, regarding this motion and he stated that he agrees with the relief requested herein.

/s/ Olivia Rosen

Olivia Rosen

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was filed with the Court's electronic case filing (ECF) system on May 16, 2024, which caused an electronic copy of this document to be served on all counsel of record in this matter who have registered for ECF service.

/s/ Gary Ewell

Gary Ewell